

a2 22. The system of claim 20, wherein the first electronic component is a storage device and the second electronic component is a circuit board.

### REMARKS

Claims 1-22 are pending in the present application. By this Response, claims 15-22 are added. Reconsideration of the claims in view of the above amendments and the following remarks is respectfully requested.

#### **I. 35 U.S.C. § 103(a) Alleged Obviousness**

The Office Action rejects claims 1-14 under 35 U.S.C. § 103(a) as allegedly being obvious in view of any one of Janko et al. (U.S. Patent No. 4,963,821), Nelson (U.S. Patent No. 5,126,657), Cole et al. (U.S. Patent No. 5,548,223), Self (U.S. Patent No. 5,859,538) or Kanamori (U.S. Patent No. 6,124,716). This rejection is respectfully traversed.

Janko teaches a probe and method for testing a populated circuit board. The probe of Janko is a sheet 20 of flexible dielectric material having metal contact pads 22 on its lower surface. An opening 30 is provided in the sheet so as to allow placement of the sheet over the circuit board 2 where the package of the IC extends through the hole. When the sheet is placed in contact with the circuit board 2 and pressure is applied, the contact pads on the sheet 20 contact test points on the surface runs 4 of the circuit board (see column 3, lines 1-8).

Janko does not teach a straight feed-through connector that has connecting pins and which connects electronic components, as recited in independent claims 1 and 8. It is hard to determine what the Examiner believes to be the same as the straight feed-through connector of claims 1 and 8. However, it appears that the Examiner alleges that the leads 12 are the same as the straight feed-through connector. However, the leads 12 of Janko do not have connecting pins as does the straight feed-through connector of claims 1 and 8.

Moreover, the flexible sheet 20 does not attach to connecting pins of a feed-through connector. While it is conceivable that the IC package may have pins for connecting to the leads 12 on the circuit board, the flexible sheet 20 is specifically designed so as to include a hole through which the IC package protrudes. Thus, the sheet 20 is specifically designed so as not to touch any pins that might be associated with the IC package.

Further, the sheet 20 is designed so that the only connection between the sheet 20 and the circuit board is the connections between pads 22 and test points (selected ones of pads 8 and leads 12). Thus, the only points at which the flexible sheet 20 contacts the circuit board is at selected pads 8 and leads 12. These contacts are made by contact pads 22 on the flexible sheet 20. Therefore, there is no teaching or suggestion in Janko to attach one end of a flexible circuit to connecting pins of a straight feed-through connector that connects electronic components.

In addition, there is no suggestion in Janko to make the necessary modifications to arrive at Applicants' claimed invention. Janko does not teach or suggest a straight feed-through connector that connects electronic components and does not teach attaching one end of a flexible circuit to connecting pins of a straight feed-through component. Thus, one of ordinary skill in the art would not be motivated to modify Janko to include these features without some other suggestion from another source. The only other source that provides such a suggestion is Applicants' own disclosure. Therefore, the only way in which Janko may be modified to arrive at Applicants' own disclosure is through the use of impermissible hindsight reconstruction using Applicants' own disclosure as a guide.

In view of the above, Applicants respectfully submit that Janko does not teach or suggest the features of independent claims 1 and 8. At least by virtue of their dependency on claims 1 and 8, respectively, Janko does not teach or suggest the features of dependent claims 2-7 and 9-14. Accordingly, Applicants respectfully request withdrawal of the rejection of claims 1-14 under 35 U.S.C. § 103(a) based on Janko.

With regard to the other cited references, Nelson, Cole et al., Self and Kanamori, the Office Action has not established a prima facie case of obviousness with regard to these references. Under *Graham v. John Deere*, 383 U.S. 1, 148 USPQ 459 (1966), in order to establish a prima facie case of obviousness, the Office Action must set forth

which features of the claims are found in the teachings of each reference, those features of the claim that are not taught by the references, and a motivation for why it would be obvious to modify the reference to include those claimed features that are not explicitly taught by the references. The Office Action has not done as much as one of these steps with regard to these references. Thus, the Office Action has not established a prima facie case of obviousness in accordance with the requirements set forth by the Supreme Court in *Graham v. John Deere* as is required under MPEP § 2141.

Rather, the Office Action merely alleges that the claims can be rejected based on these references and then only gives a few sentences regarding the Janko reference with an allegation that it would be obvious to display the output of a test instrument in the Janko system. As a result, the Office Action has not met its burden of establishing a prima facie case of obviousness with regard to these references and cannot now shift the burden to Applicants by merely making an allegation as to the applicability of these references without some analysis being provided. It is not Applicants' burden to come up with a rejection based on these references simply because the Office Action alleges that the claims could be rejected based on their teachings.

Since the Office Action has not met its burden of establishing a prima facie case of obviousness, Applicants are under no obligation to address these references. However, Applicants respectfully submit that, as which the Janko reference discussed above, none of these references teach or suggest a straight feed-through connector with connecting pins that connects electronic components. Furthermore, none of these references teach or suggest attaching one end of a flexible circuit to connecting pins of a straight feed-through connector that connects electronic components. Moreover, there is no teaching or suggestion to make the necessary modifications to these references to arrive at Applicants' claimed invention and the Office Action has not pointed to any such teachings or suggestions.

Thus, in view of the above, Applicants respectfully submit that the Office Action has not met its burden under 35 U.S.C. § 103(a). Furthermore, Applicants respectfully submit that none of Nelson, Cole et al., Self and Kanamori teach or suggest the features of independent claims 1 and 8. At least by virtue of their dependency on claims 1 and 8, none of these references teach or suggest the features of dependent claims 2-7 and 9-14.

Accordingly, Applicants respectfully request withdrawal of the rejection of claims 1-14 under 35 U.S.C. § 103(a) based on Nelson, Cole, Self and Kanamori.

## **II. Newly Added Claims**

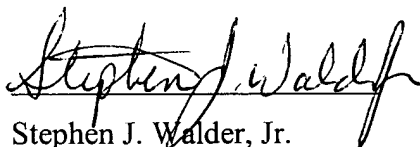
Claims 15-22 are added to recite additional features of the present invention. Specifically, claim 15 recites a driver, a motherboard, and an interposer connector. Claim 16 recites that the first end of the flexible circuit is held between two snap-fit halves of the interposer connector. Claim 17 recites that the first end of the flexible circuit is provided with a plurality of openings through which the connecting pins of the interposer connector establish a connection between the interposer connector and the flexible circuit. Claims 19 and 20 recite that a first end of the straight feed-through connector is directly connected to a first electronic component and a second end of the straight feed-through connector is directly connected to a second electronic component and that the flexible circuit is directly coupled to the connecting pins. Claims 21 and 22 recite that the first electronic component is a storage device and the second electronic component is a circuit board. Support for these claims may be found at least in Figures 5A, 6A, 6B and 8 of the present specification. None of the cited art teaches any of the above features of newly added claims 15-22.

### III. Conclusion

It is respectfully urged that the subject application is patentable over Janko, Nelson, Cole et al., Self and Kanamori and is now in condition for allowance. The Examiner is invited to call the undersigned at the below-listed telephone number if in the opinion of the Examiner such a telephone conference would expedite or aid the prosecution and examination of this application.

Respectfully submitted,

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